

MELINDA HAAG (CABN 132612)
United States Attorney

DAVID R. CALLAWAY (CABN 121782)
Chief, Criminal Division

KATHRYN HAUN (DCBN 484131)
WILLIAM FRENTZEN (LABN 24421)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
Kathryn.haun@usdoj.gov
William.frentzen@usdoj.gov

RAYMOND N. HULSER (MABN 551350)
Acting Chief, Public Integrity Section

RICHARD B. EVANS (DCBN 441494)
Trial Attorney

1400 New York Avenue, N.W.
Washington, D.C. 20005
Telephone: (202) 353-7760
Richard.B.Evans@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

3-15-70370

UNITED STATES OF AMERICA,

v.

CARL M. FORCE IV and
SHAUN W. BRIDGES,

Defendants.

SEALING APPLICATION AND [PROPOSED]
SEALING ORDER

The United States hereby applies for an order directing that the sealed paragraph of the affidavit in the above-titled matter, together with the application and this court's sealing order,

SEALING APPLICATION AND SEALING ORDER

FILED

MAR 25 2015

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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1 be kept under seal until further order of the Court. The United States requests that the above-
2 described materials be sealed to preserve the confidentiality of the matters under seal in *United*
3 *States v. Ulbricht*.

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6 WHEREFORE, I respectfully request that the Court issue an order granting this
7 application.

8 DATED: March 25, 2015

Respectfully submitted,

9 MELINDA HAAG
10 United States Attorney

11 
12 _____
13 WILLIAM FRENTZEN
14 Assistant United States Attorney

15 **ORDER**

16 For good cause shown, IT IS HEREBY ORDERED THAT:

17 The sealed paragraph of the affidavit in the above-titled matter, together with the
18 application, and this Court's sealing order, be kept under seal until further order of the Court.

19
20 IT IS SO ORDERED.

21
22 DATED: March 25, 2015

23 
24 _____
25 HONORABLE MARIA ELENA JAMES
26 UNITED STATES MAGISTRATE JUDGE
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28

PARAGRAPH PROVIDED TO COURT UNDER SEAL

I am aware that the federal prosecutors who are prosecuting this case made substantive disclosures to the prosecutors in both the Southern District of New York and the District of Maryland very early on in the government's investigation against FORCE. Those disclosures continued throughout this investigation.

In advance of trial in United States v. Ulbricht, the Southern District of New York prosecutors took the information concerning the FORCE investigation and disclosed it in a detailed letter filing to the federal judge presiding over that trial, Judge Katherine B. Forrest. Those prosecutors requested permission to provide that disclosure to Ulbricht and his defense team under seal and pursuant to a Protective Order. Judge Forrest ordered that disclosure made to Ulbricht and his defense team, and the disclosure was made in December 2014. Because of the sensitive nature of the investigation, the fact that investigation was still ongoing (and subject to the strictures of Fed. R. Crim. P. 6(e)), and the fact that FORCE had not worked on the New York Silk Road investigation, Judge Forrest ordered that the fact of the FORCE investigation information remain under seal until further order of the Court.

My understanding from the prosecutors in this Northern District of California case against FORCE and BRIDGES is that, as soon as FORCE and BRIDGES are apprehended and/or surrender and the Complaint is therefore unsealed, the prosecutors in the Southern District of New York will make an application to Judge Forrest to unseal the previously-sealed disclosures that were made to Ulbricht and his defense team.

However, because those matters are sealed and the instant Complaint will become automatically unsealed upon the apprehension and/or surrender of FORCE and BRIDGES, I seek a separate Protective Order with respect to this Paragraph that is intended for Page 11 of the Affidavit. I request that this Paragraph remain sealed until further order of this Court. The government will submit an unsealing request for this Paragraph immediately upon learning that Judge Forrest has unsealed the underlying documents and materials in the Ulbricht matter. A Proposed Order is attached.